

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

BEN RODGERS, INDIVIDUALLY, AND ON  
BEHALF OF AND FOR THE USE AND  
BENEFIT OF THE WRONGFUL DEATH  
BENEFICIARIES OF EDNA RODGERS

PLAINTIFF

VS.

No. 3:23-cv-00413-KHJ-MTP

CHADWICK NURSING AND  
REHABILITATION CENTER, LLC, AURORA CARES, LLC,  
ETHEL SMITH, LPN, JANICE BRUMFIELD, LPN,  
UNIDENTIFIED ENTITIES 1-10, AND  
JOHN DOES 1-10 (AS TO CHADWICK FACILITY)

DEFENDANTS

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**MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

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Defendant Aurora Cares, LLC (“Aurora Cares”) files this Motion to Dismiss for Lack of Personal Jurisdiction. For the reasons more fully set forth in the accompanying Memorandum Brief, Aurora Cares requests that the Court dismiss Plaintiff’s claims against it.

In support of this Motion, Aurora Cares submits the following exhibits, which are attached hereto:

- Exhibit A: Declaration of Bobby Hamilton;
- Exhibit B: Declaration of Ranessa Myles; and
- Exhibit C: Plaintiff’s Complaint.

**WHEREFORE, PREMISES CONSIDERED,** Aurora Cares respectfully requests that the Court dismiss Plaintiff’s claims against it.

This 28th day of June 2023.

Respectfully submitted,

AURORA CARES, LLC

By Its Attorneys,

s/ Clay Gunn

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day the foregoing document was filed electronically with the Clerk of the Court using the Court's ECF system, which served a true and correct copy of such paper electronically on the following counsel of record:

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**ATTORNEY FOR PLAINTIFF**

THIS the 28th day of June 2023.

s/ Clay Gunn